

SAMUEL BERNARD JOHNSON, III
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Plaintiff - *In Pro Se*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SAMUEL BERNARD JOHNSON III

Plaintiff,

VS.

CHEVRON CORPORATION, a Delaware corporation, CHEVRON CORPORATION LONG-TERM DISABILITY PLAN ORGANIZATION, a Delaware corporation, CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY, a California corporation, CATHERINE DREW, KATHRYN M. GALLACHER, ROBERT SCHMITT, HARALD SMEDAL, SUSAN J. SOLGER, SELLERS STOUGH, KRYSTAL TRAN, DEBBIE WONG, GARY A. YAMASHITA, and DOES 1-5,

Defendants

Case No.: C 07-05756 SI (JCS)

**PLAINTIFF'S OBJECTIONS AND NOTICE
OF INTENT TO MOVE TO QUASH THE
SUBPEONA ISSUED TO "LORIN FRANK,
PH.D"**

1 **TO DEFENDANTS CHEVRON CORPORATION, CHEVRON**
2 **ENVIRONMENTAL MANAGEMENT COMPANY, THEIR ATTORNEY OF RECORD,**
3 **FIRST REPROGRAPHICS AND LORIN FRANK, PH.D.:**

4 **PLEASE TAKE NOTICE** that Samuel Bernard Johnson III (hereinafter referred to as
5 "Plaintiff Johnson") **HEREBY OBJECTS TO**, and intends to **MOVE TO QUASH** in its
6 entirety, the subpoena issued by First Reprographics, Chevron Corporation, Chevron
7 Environmental Management Company and their attorney of record Filice Brown Eassa &
8 McLeod LLP to Lorin Frank, Ph.D. seeking the production of certain medical records (requested
9 on Attachment To Subpoena In A Civil Case) pertaining to Plaintiff Johnson's two minor
10 children on August 29, 2008.

11 Plaintiff Johnson asserts that the subpoena is improper and no records (requested on
12 Attachment To Subpoena In A Civil Case) should be produced to First Reprographics, Chevron
13 Corporation, Chevron Environmental Management Company and their attorney of record Filice
14 Brown Eassa & McLeod LLP on the following grounds, until the objections and/or motion to the
15 Court is resolved:

- 16 • Failure of Chevron Corporation, Chevron Environmental Management
17 Company and their attorney of record Filice Brown Eassa & McLeod LLP
18 to properly serve Plaintiff Johnson with notice of the subpoena prior to its
19 issuance by First Reprographics to Lorin Frank, Ph.D.;
- 20 • Failure of First Reprographics, Chevron Corporation, Chevron
21 Environmental Management Company and their attorney of record Filice
22 Brown Eassa & McLeod LLP to provide timely notice to Plaintiff Johnson
23 of the issuance of the subpoena prior to its issuance;
- 24 • Lack of relevance of the requested documents to Plaintiff Johnson's claims
25 in this action;
- 26 • Lack of relevance of the requested documents to Chevron Corporation and
27 Chevron Environmental Management Company's defenses against
28 Plaintiff Johnson's claims in this action; and

- The subpoena seeks to harass and intimidate Plaintiff Johnson.

/s/

Dated this 25th day August of 2008

SAMUEL BERNARD JOHNSON III